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February 2, 2024

VIA ECF

Honorable Eric N. Vitaliano
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Javier Aguilar, No. 20 Cr. 390 (ENV) (E.D.N.Y.)

Dear Judge Vitaliano:

We write on behalf of Defendant Javier Aguilar further to the Court's February 1, 2024 order requiring the parties to "notify the Court by the close of business [on] February 2, 2024, of the names of any witnesses they anticipate calling should the Court choose to hold a hearing on issues of foreign law outside the presence of the jury." Mr. Aguilar intends to call Dr. Mariana Mureddu Gilabert to testify regarding issues of Mexican law. Based on Dr. Mureddu's schedule, Mr. Aguilar respectfully requests that, if the Court chooses to hold a hearing with live, in-court witness testimony, the Court do so on February 16, 2024. Alternatively, Dr. Mureddu can appear for testimony by Zoom or another videoconferencing service on February 9, 2024. In either event, Dr. Mureddu would require the assistance of a Spanish interpreter to testify.

We thank the Court for its attention to these issues.

Respectfully submitted,

/s/ Daniel R. Koffmann

Daniel R. Koffmann
Counsel for Defendant Javier Aguilar

cc: Counsel of Record (via ECF)

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